



**VASQUEZ BOULEVARD/INTERSTATE 70 SITE
WORKING GROUP MEETING**

**FINAL MEETING SUMMARY (Revised 3/4/99)
January 28, 1998**

**EPA Offices
999 18th Street
2nd Floor Conference Room
Denver, CO**

In Attendance

Working Group

Bonnie Lavelle, EPA Region 8
Chris Weis, EPA Region 8
Matt Cohn, EPA Region 8
Susan Muza, ATSDR
David Mellard, ATSDR
Anthony Thomas, Clayton Neighborhood Association
Joan Hooker, Clayton Neighborhood
Sandy Douglas, Cole Neighborhood
Melissa Muñoz, Colorado People's Environmental and Economic Network
Lorraine Granado, Cross Community Coalition, Swansea Neighborhood
Celia VanDerLoop, City and County of Denver, Dept. of Environmental Health
Chuck Patterson, Globeville Neighborhood
Toni Riley, Globeville Neighborhood
Jane Mitchell, CDPHE
Robert Litle, Asarco Globe Plant
Linda Larson, Heller Ehrman White & McAuliffe(Asarco)
Frances Hartogh, State of Colorado, Attorney General's Office
Barbara O'Grady, State of Colorado, Dept. of Public Health and Environment

Others (on Contact Group list or who signed the guest sheet)

Joyce Tsuji, Exponent (Asarco)
Patricia Courtney, EPA Region 8
Marion Galant, Colorado Dept. of Public Health and Environment
Theresa NeSmith, ATSDR
Wendi Thomi, EPA Region 8
Michael Wenstrom, EPA Region 8 Environmental Justice
Jim Paulmeno, State of Colorado, Dept. of Transportation – Environmental Service
Maureen O'Reilly, EPA Region 8
Sonya Pennock, EPA Region 8
Dennis Jaramillo, EPA Region 8

Bill Ross, EPA Region 8

Facilitators

Mary Margaret Golten, CDR Associates

Louise Smart, CDR Associates

Kate Whitby, CDR Associates – Washington DC Metro Office (notetaker)

Information Updates

Proposed NPL Listing. The Working Group began by discussing *EPA's decision (released to the press on Friday, January 15), to propose adding the site to the National Priorities List (NPL).* **[NOTE: *Italic indicates potential action item/decision.*]** As part of the NPL listing process, EPA will accept comments on its proposed listing decision for sixty (60) days. *EPA's public comment period will run through March 22, 1999.* People interested in commenting on the proposed NPL listing should send the original comments and three copies to:

Docket Coordinator
Headquarters U.S. EPA; CERCLA Docket Office (5201G)
401 M Street SW
Washington, DC 20460

The information package that forms the basis for EPA's listing proposal is available for review at three locations:

EPA's Region 8 office, 5th floor;
Cross Community Coalition offices at 2332 East 46th Street, Denver; and
Valdez-Perry Library.

In addition, EPA also is establishing a document repository location at the Ford Warren Public Library.

Several Working Group members expressed concern that there was no document repository in Clayton and referred to a prior agreement that information about the site would be placed in Councilman Hiawatha Davis' office and at the fire station. *EPA indicated they are considering other repository locations. EPA is trying to reach agreements with possible repository locations by the week of February 8.*

PRP Identification. Following on the NPL listing discussion, Mel Muñoz requested information about EPA's progress in identifying potentially responsible parties (PRPs) who could be tasked with performing or paying for site cleanup work. EPA responded that identifying PRPs depends on identifying the physical and chemical nature of the site contaminants. This information will help to identify the source of the contaminants

and help EPA make progress in identifying PRPs. EPA has performed a PRP search. The data has been received and is being analyzed by the agency. No notice letters have been sent. There will be more research conducted.

Meeting Summary Review

The Working Group reviewed proposed changes to the meeting summaries from the November and December sessions. After discussing the changes and making further adjustments as needed, *the Working Group approved meeting summaries for both months (see attached meeting summaries)*. In the course of approving those summaries, the Working Group members noted several points of particular importance.

Individual or Group Representation. Second, the members of the Working Group sit on the Working Group as individuals and not as officially designated "representatives" of their communities or neighborhoods. Prompted by a concern raised by Anthony Thomas, the Working Group clarified that Working Group members from the community are representative of their neighborhoods. They will keep constituent groups informed and will solicit individual input from constituents. Working Group members may or may not represent the interests of others. The Procedural Guidelines for the Working Group were modified to reflect this role for Working Group members. Several members asked about possible contradictions between this individuality and EPA's efforts to notify a member and an alternate before EPA comes into a neighborhood. EPA responded that the purpose of notifying Working Group members is to take advantage of an existing channel of communication into the neighborhood, so that residents know what EPA is doing and can respond to neighborhood questions or concerns. EPA will seek the views of others in the communities besides those on the Working Group. *EPA committed to updating the Working Group members about scheduled or ongoing community activities as part of the regular Working Group meetings.*

FACA Requirements/Limitations. Third, EPA explained that the requirement that members sit as individuals, not as officially designated representatives, relates to the Federal Advisory Committee Act (FACA). If Working Group members are official representatives for their communities, then under FACA there are a number of requirements. These include EPA obtaining approval for creation of the Working Group from the Office of Management and Budget, publishing notice of all meetings in the Federal Register, and opening all meetings to the general public (including the press). EPA did not feel that it had the time, need or ability to create a FACA group for the Vasquez site, and so it did not set up the Working Group under FACA. (There is a Presidential Order which discourages the formation of FACA committees.) In EPA's view, this does not limit or change the Working Group's role with respect to the site: the Working Group meetings create a place to discuss the site. The individual members of the Working Group can and will make recommendations to EPA about the site, both within the Working Group structure and, if necessary, outside it. However, EPA cannot seek the Working Group's recommendation by consensus. EPA will conduct other public involvement activities to satisfy requirements of Superfund and will provide opportunities for formal public comment on any clean up decisions.

Press Release Process and Miscommunications. Finally, Sandy Douglas, Joan Hooker, Anthony Thomas, and Lorraine Granado talked about the problems created by EPA's issuing a press release about the site's proposed NPL listing without first notifying the members, particularly when the names of some of the members also were provided to the media. These problems included:

- Working Group members receiving calls from newspaper reporters asking for comments about the press release when the members had not seen the document.
- The publication of frightening stories about the site in the press.
- Damaging the members' ability to respond to those newspaper stories, or to tell community members that site conditions are not as bad as the stories imply.
- A loss of trust in EPA. In past sessions, the Working Group discussed the partnership that was being created with EPA, yet the members did not receive even a courtesy copy of the press release when EPA issued it, and still had not received one.

EPA agreed that it should have notified the members about the press release and apologized for the miscommunication. EPA reminded the members that it is counter to EPA policy to request outside comment on press releases before they go out. EPA also noted that it can and must engage in and take actions regarding the site that are outside the Working Group process, including community relations activities and press/public notice events.

EPA agreed that in the future it will:

- *Send all press releases related to the Vasquez site to the Working Group members at the same time that it sends them to the press.*
- *Try to give the members a half day "heads up" notice of an upcoming press release.*
- *Alert the Working Group members about an event that is coming up which may generate media interest and/or a press release. EPA will set up an update process (to be defined) that will include these alerts.*
- *Notify anyone whose name is given to the press about that fact immediately, which means at the same time or before EPA releases the person's name or contact information.*

EPA and the members also discussed:

- Setting up a process for EPA to use when it sends notices about, and copies of, press releases. That process may include a mixture of phone calls and/or messages and distribution of copies at Working Group meetings or via fax, e-mail and/or U.S. mail.
- EPA working with the members to develop a list of people who are willing to have their names released to the media.
- EPA providing "updates" about upcoming site activities, including potential media contacts, as a regular part of the Working Group meetings.
- A one-page update sheet should be provided to Working Group members at least monthly, including:
 - Status of data collection/analysis
 - Anything that will get media interest
 - Community involvement activities
 - Any EPA decisions
 - Status of the sampling work

EPA distributed copies of the January 15 press release to the Working Group session participants (attached).

History of Sampling at the Site

The Working Group then moved on to the history of soil sampling events at the site. Bonnie Lavelle summarized the phased process EPA used in the past, the results of the various phases and the availability of those results to the members, and the plans EPA has for future phases of sampling activities.

Phase I Sampling. EPA's history of sampling activities concerning the site began by targeting homes, schools and parks located between East 56th Avenue on the north, East 38th Avenue on the south, the South Platte River on the west, and Colorado Boulevard on the east.

EPA identified the properties that would be sampled by using several steps. First, EPA did some preliminary investigation to establish the likely boundaries of the contaminated properties. This investigation focused on metals contamination and was drawn with a broad brush.

After EPA set those broad-brush boundaries, it looked at tax assessor records to identify each property's owner of record. EPA sent these owners of record, letters telling them that EPA wanted to sample their properties, and included proposed access agreements with the letters for the owners to sign and return. Only about 20% of the people EPA contacted responded with permission to sample their properties. EPA's on-scene coordinator, Pete Stevenson, knew that EPA had sufficient resources to

sample more than 20% of the homes in the area, so he sent crews out knocking on doors and asking in-person for permission to sample.

The end result of these letters and face-to-face contacts was that EPA received permission to sample 1,052 properties.

As for the actual sampling process itself, during Phase I EPA made a hole in the ground at each property and removed one soil sample, beginning below the grass, at the 0"-2" depth in the front yard. They took a second sample at 0"-2" below the grass in the back yard, and a third sample from either the front or back yard but at depth – 0 to 12 inches below the grass. This sampling process created three pieces of information about each property, which it sent to a laboratory for analysis regarding the presence and level of metal contamination.

Once EPA received the analytical results back from the lab, it compared each sample against EPA's action levels for removal actions. These action levels were established by EPA specifically for this Site. They are meant to be used to identify levels of chemicals above which there is an unacceptably high risk of adverse health effects if people are exposed in a residential scenario. The action levels should be compared to the average levels of chemicals in a yard. The removal action levels for this site are 450 parts per million (ppm) for arsenic and 2,000 ppm for lead.

If any one of the three samples from a property showed contamination at a level above 450 ppm for arsenic or 2,000 ppm for lead, EPA identified that property as a potential candidate for a removal activity. This examination showed that samples taken from 46 properties contained either lead or arsenic at a level greater than the allowed amount.

EPA then looked closer at the information it possessed about these 46 properties, and found:

Seven of the properties had contamination greater than the action levels, but the contamination was only present in the at-depth samples, and not in the surface samples. EPA therefore did not view these properties as presenting an immediate threat.

Of the 39 remaining properties (46 minus 7):

One is a parking lot. In EPA's view this property does not pose an immediate threat because EPA's calculation of an immediate threat assumes that someone is living on the property, breathing in dust, touching the contaminated soil, and otherwise exposing him or herself to long-term contact with the contamination. There are no people living on the parking lot or subject to these assumed paths of contact or exposure. This does not mean that the property is not of concern to EPA in the long term, but it is not of immediate concern.

One property had high concentrations of lead, but not from contamination in the soil. Rather, at this property the lead levels came from flecks of flaking lead-based paint in the sample. Again, the nature of this contamination took it out of EPA's removal action category, although it remains on EPA's list of properties of concern.

This left 37 properties (39 minus 2) that had samples showing contamination at levels above EPA's removal action levels for this site.

At this point EPA recognized that three samples per property is appropriate for screening out sites from consideration for removal but may not be enough to adequately characterize exposure. EPA therefore decided to do more sampling at these properties before undertaking removals and began Phase II of the sampling.

Phase II Sampling. EPA had two objectives when it began the Phase II round of sampling. First, it wanted to obtain better information about the contamination present in the 37 remaining properties of concern from Phase I.

Second, EPA wanted to extend its sampling activities to properties south of 38th Avenue down to 35th Avenue. EPA used two different sampling methods for the two groups of properties – the Phase I lots with samples above removal action levels and the new Phase II lots that had not been sampled before.

For its Phase II sampling of the 37 remaining Phase I lots, EPA took 5 samples from the front yard and 5 samples from the back yard of each property. EPA then combined all 5 front yard samples into one composite sample and all 5 back yard samples into a second composite sample. EPA sent these two composite samples from each property to the lab for analysis.

When dealing with the new Phase II lots that had not been sampled before, EPA used the same method for sampling that it had used during Phase I – it took one shallow sample from the front yard, one from the back yard, and a third sample at depth from either yard. As with Phase I, EPA did not composite these samples, but sent three samples from new properties sampled during Phase II to the lab for analysis.

EPA used the same method to obtain access to new Phase II lots for sampling that it had used during Phase I; it sent letters to each property's owner of record requesting permission to sample. Because of concerns about timing, EPA did not follow-up with door-to-door requests for access during Phase II.

One of the Working Group members observed at this point that the members have a standing offer to EPA to assist with access efforts. EPA responded that it will take advantage of that offer in future rounds of sampling and acknowledged that EPA must get more property owners to consent to sampling if it is to get an accurate picture of the existence and extent of contamination at the site.

The result of the Phase II sampling analysis regarding the 37 remaining Phase I lots showed that EPA's prior sampling method had overestimated the exposure to contamination that existed at 16 of the 37 properties. David Mellard questioned EPA about this conclusion and asked whether the discrete samples in Phase I samples can be used to accurately characterize exposure. . EPA said that the composite procedure produced a better representation of the actual exposure conditions that exist at the properties. Again, in EPA's view, these 16 properties did not present a problem which required immediate removal actions.

The Phase II sampling of the remaining Phase I lots left 21 properties (37 minus 16) with samples showing contamination at levels greater than the removal action levels. EPA contacted these property owners and discussed EPA's plans for removal activities. Three owners did not want their yards remedied. Eighteen owners consented to EPA's removal action. Removal activities at these 18 properties are complete.

General Discussion regarding Site Sampling and EPA Activities. EPA referred the members to maps it brought to the Working Group session. These maps show the neighborhoods that were sampled in either Phase I or Phase II, as well as the actual homes that were sampled.

EPA also offered to set up separate study sessions with any interested members to go through the two reports, which contain all of the sampling information and results. These reports contain lists of property addresses and arsenic and lead levels. They can be used to look up whether a specific property was sampled and with what results.

EPA summarized the number of properties that exist in each neighborhood of the site and the number of properties that were sampled during Phase I or Phase II.

Neighborhood	# Homes	# Sampled
Clayton	1439	189
Cole	1352	186
Swansea/Elyria	1670	1005
Globeville	1012	18
	(all Globeville)	(west of I-25, south of I-70)

EPA and the members then discussed EPA's phased approach to sampling, the results of the sampling events and EPA's ongoing and future plans for further site analysis and/or investigation.

The discussion began with questions concerning the relationship between EPA's proposed Vasquez site and the State of Colorado's Globeville site. The State of Colorado representative indicated that the State site was not included in EPA's sampling.

Next, EPA explained its intentions regarding the site boundaries and expansion past 35th Avenue into the Cole and Clayton neighborhoods. Because of the random pattern of contamination, EPA is trying to sample all of the properties that fall within the study area. If the site boundaries need to be expanded out from the existing limits, EPA will consider such an expansion, but first it wants to test everything within the current study area.

Lorraine Granado inquired about the specific metals that are the subject of EPA's analysis. EPA stated that with respect to arsenic, it realizes that the type of arsenic found is very important for identifying PRP's as well as other purposes. The sampling so far shows a predominance of arsenic trioxide, which may or may not be linked to the same PRP as the Globe site. EPA further responded that with respect to cadmium and zinc, which are also indicator metals from the Globe site, it currently is reanalyzing the Phase I and II archived samples for the presence of cadmium and zinc. When the results come in, EPA will discuss them with the Working Group.

A member also asked about sampling within the boundaries of South Globeville. EPA included South Globeville in its Phase II sampling plan. This area has been sampled by Asarco, with oversight by the State under the Globe Consent Decree. EPA does not intend to resample those properties which have been previously sampled, provided that the data is good quality and meets the objectives of this study.

Risk-based Sampling. EPA is still trying to understand the nature and extent of contamination present at the site. Accordingly, EPA went back and selected 8 properties for a new round of risk-based sampling and analysis. For this study event, EPA took a soil sample every five feet. EPA then sent the samples to the lab for laboratory analysis of arsenic and lead. EPA is analyzing each individual sample and did not combine the samples into composites. The results of this round of sampling are not yet available, but EPA will let the Working Group know when they arrive. EPA tested indoor dust from removal properties and fruit and vegetables from one property, and has conducted bio-monitoring of some of the residents from the removal properties.

Phase III Sampling. Finally, EPA plans to run a third phase of sampling sometime after June 1999. During Phase III, EPA will try to obtain consent to sample the properties that were missed during Phases I and II. EPA has not yet determined how or what it will sample during this phase of the site work. It will use the results of the earlier phases/rounds, as well as the Working Group's community and technical resources, to decide the best ways to perform Phase III.

EPA is attempting to get sufficient information to understand the relationship between contamination in exterior soils and interior dust. It also is aware of construction-type activities at locations outside the proposed site boundaries and is beginning to work with other agencies and their contractors to understand and/or control conditions within the site.

Draft Risk Management Objectives

EPA distributed a handout itemizing its risk management objectives for the Vasquez site. EPA's purpose in creating the document was to combine the objectives that the Working Group brainstormed at the December meeting and to organize them into categories. The document is organized according to goals:

- General
- Human Health Risk Assessment Goals
- Ecological Risk Assessment Goals
- Remedial Action Plans
- Miscellaneous

It is an attempt to present the guiding objectives that will allow EPA to set up an appropriate risk assessment.

After allowing time for review, EPA posed questions to the members.

- Did we get the objectives right?
- Do they look correct?
- Did we miss anything from December?

Lorraine Granado responded that EPA missed a community goal of achieving a cleanup that meets MRL's for all indicator metals, including cadmium and zinc. EPA responded that the goal of the document was to set out risk management objectives. Achieving an identified MRL is a very specific clean up goal and part of the future risk management effort. EPA is attempting at this point to identify risk assessment goals. Susan Muza and Bonnie Lavelle explained that for arsenic and zinc, ATSDR oral MRL values and EPA oral RfD values are the same. For cadmium, the values are very similar. For lead, EPA has not established an oral RfD and ATSDR has not established an oral MRL.

This response prompted an extended discussion of the difference between risk management and risk assessment, further attempts by EPA to define the purpose of the document, and indications from the members that the document was confusing as currently drafted because it combined both risk management and risk assessment concepts.

EPA agreed to revise the Draft Risk Management Objectives for further review and discussion at the February Working Group meeting. Toward that end, the members suggested several changes to the document which EPA agreed to include in the next version. EPA also explained that after finalizing the objectives document, its next planning step will be to draw a flow-chart model or diagram of the site that includes contaminant sources, the movement of compounds, and possible exposure concepts, both in terms of who may be affected and how they are exposed. EPA will present that model or diagram to the Working Group at one of the next few meetings.

Continuing with the discussion of items to include in the next revision of the objectives, a member suggested that EPA look at diseases associated with the site. ATSDR responded that rates of disease at the site would be something for ATSDR to look at, not EPA. ATSDR looks at the current health effects and actual disease rates associated with a Superfund site. EPA looks at chemicals of concern to predict potential health risk, but does not look at existing health conditions. Anthony Thomas and Joan Hooker then suggested that ATSDR look at actual disease rates in the neighborhoods, including incidences of cancer, retardation in children, and other adverse health effects.

Another member offered two new goals for inclusion in the revised document:

To understand the degree and extent of contamination present at the site sufficiently to be comfortable that all contaminated areas will be addressed by the remedy.

If any contamination remains in place after construction of the remedy is complete, the remedy will ensure that adequate, protective and enforceable institutional controls are in place.

Yet another member observed that under the document's section on human health risk assessment, EPA indicates that a goal is to provide community residents with information about the site. EPA must ensure that it provides community information in a format that the community can understand—in language that is understandable within the community. Also, any information must be presented in both English and Spanish.

Community Involvement Update

EPA is currently performing community interviews to determine neighborhood residents' outreach needs, as well as their preferred involvement processes and desires. EPA staff are asking for more names of people they should be talking to about the site. EPA is always looking for more people to be interviewed and brought a copy of the interview questions to the Working Group session. EPA is sending the written interview questions out to interviewees ahead of time so that people can think about them, gather phone numbers, etc.

EPA will include the information produced through these interviews in its community relations plan. EPA also will release information about the site in future press releases. EPA's community relations staff will make the general contents of the draft community relations plan available for review by members of the Working Group, those people who were interviewed, or anyone else who requests it, before it is final.

In terms of timing, EPA hopes to finish the interviews by the end of February. After that, it will take another six weeks before a draft community relations plan can be circulated for comments.

EPA is also setting up document repositories for community review of site-related information. EPA will be sending out a fact sheet explaining the proposed NPL listing,

providing comment period details and deadlines, and showing the locations of the document repositories. EPA plans to include the fact sheet in public and community newsletters rather than sending out a bulk mailing, and hopes to finalize it soon. (It is at the translators now.) EPA also will be putting ads into local English and Spanish newspapers.

EPA stated that Denver councilwoman Ortega has told EPA of her desire for a public meeting about listing the site on the NPL and asked for thoughts from the Working Group about a public meeting. Lorraine Granado answered that she needed to meet with the other community members and talk before giving an answer, but noted that the last public meeting about the site did not have much attendance. EPA agreed, but noted that if a public meeting is to occur, it must happen soon so that there is sufficient time to get a transcript ready and still meet the public comment period closure deadlines.

Finally, several members discussed the advisability of inviting or encouraging a media presence during Working Group sessions. Although they realized it is not possible to forbid a press presence, they would rather not have the press attend the meetings. They believed it would hamper open conversation among Working Group participants.

Evaluation of the January 28 Working Group Meeting

What the Working Group liked:

EPA's information sheets on soils is clear and useful

The suggestion that Bonnie Lavelle set up small groups for additional technical information or explanations outside the regular Working Group meetings

EPA providing updates each or every other Friday about new site developments, including informal data availability status reports

The Working Group suggested improvements on:

Getting information in an unzipped format

Don't fax to Toni Riley without calling first.

Get a list of addresses to community reps for help in contacting owners for sampling access.

Include time on the agenda for parking lot issues from post-its

Post-Its/Parking Lot Items

1. Consider as an exposure pathway the route taken by trash trucks. Also consider the Burlington Railroad, and I-70 and I-25.
2. Not calling before faxing. (from T. Riley)
3. 1999 Removals for new properties above 450 ppm arsenic need to be planned for (assuming a new more comprehensive sampling event takes place in summer '99).
4. What efforts were made to obtain access from removable properties? (Did community relations staff make attempts or only Pete?)
5. Communities need information on locations of contamination above background but below removal levels.
6. Suggested monthly 1 page briefing contents:
 - sampling (or plan) status
 - press activities
 - community relations activities

Baseline Risk Assessment status
next month's plans

7. Intensive sampling results due in late February/early March (includes dust, vegetable sampling).

Future Dates, Locations and Topics

The Working Group's **next meeting is on Thursday, February 18, from 8:30 a.m. to 1:00 p.m. at the Swansea Recreation Center (SRC)**. The agenda will include:

- EPA's revised Final Risk Management Objectives document
- EPA's draft Site Conceptual Model diagram
- Comments from the State, Denver and ATSDR on EPA's "Draft Data Report for the Vasquez Boulevard & I-70 Residential Soils Supplemental Investigation Physico-Chemical Characterization of Soils" and EPA's responses to those comments
- EPA's public involvement plans
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- Review, modification and approval of the January 28 Meeting Summary

Future meetings are scheduled for 8:30 a.m. to 1:00 p.m., unless otherwise noted:

Thursday, March 4 at EPA's Offices (EPA)	Results of Risk-based Sampling.
Thursday, March 18 (SRC)	Exposure Pathway Equations.
Thursday, April 8 (EPA)	Exposure Pathway Equations (cont'd).
Saturday, April 24 (SRC), 9:00 am to Noon	Draft Dose Calculations
Thursday, May 6 (EPA)	Toxicity Values
Thursday, May 27 (SRC), 5:30 pm to 8:30	Groundwater Investigation
Thursday, June 10 (EPA)	TBD, based on progress to date

Summary of Decisions and Action Items

1. The Working Group's next meeting is on Thursday, February 18, from 8:30 a.m. to 1:00 p.m. at the Swansea Recreation Center (SRC).
2. The Working Group members should read the Draft Meeting Summary of the January 28 meeting and provide comments or corrections to the facilitators.
- 3.
4. EPA will revise the Draft Objectives for Risk Management document and distribute it to the members at the next meeting.
5. EPA will prepare and distribute a draft Site Conceptual Model diagram to the Working Group for discussion at the next meeting

6. See other italicized areas in text above.

7. The Working Group members should read EPA's responses to comments received on the draft data report which presents the results of physical and chemical characterization of soils. These responses were mailed to all working group members on January 26, 1999.

To contact the facilitators (Mary Margaret Golten and Louise Smart at CDR Associates),

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